

**LAW OFFICES OF DALE K. GALIPO**

Dale K. Galipo, Esq. (Bar No. 144074)  
dalekgalipo@yahoo.com  
Cooper Alison-Mayne (Bar No. 343169)  
cmayne@galipolaw.com  
21800 Burbank Boulevard, Suite 310  
Woodland Hills, California, 91367  
Telephone: (818) 347-3333  
Facsimile: (818) 347-4118

**LAW OFFICES OF DEAN PETRULAKIS**

Dean Petrulakis, Esq. (Bar No. 192185)  
1600 G Street, Suite 202  
Modesto, CA 95354  
Tel: (209) 522-6600

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

DOROTHEY HEIMBACH,  
individually and as successor in  
interest to Anthony Silva,

Plaintiff,

vs.

STANISLAUS COUNTY; and  
JUSTIN CAMARA, ZA XIONG, and  
ERIC BAVARO, in their individual  
capacities,

Defendants.

Case No. 2:23-cv-01887-DJC-KJN

Judge: Hon. Daniel J. Calabretta  
Magistrate Judge: Kendall J. Newman

**STIPULATION FOR VOLUNTARY  
DISMISSAL OF CERTAIN  
MONELL CLAIMS**

[Proposed Order filed concurrently  
herewith]

**TO THE HONORABLE COURT:**

IT IS HEREBY STIPULATED by and between Plaintiff Dorothey Heimbach and Defendant Stanislaus County, through their respective attorneys of record, following a meet and confer regarding the claims in this case, as follows:

1. Plaintiff voluntarily dismisses the fifth cause of action in her operative complaint, alleging municipal liability based on an unconstitutional custom, practice, or policy against Stanislaus County; and
2. Defendants agree to conduct Plaintiff Dorothey Heimbach's deposition via videoconference rather than in person.

IT IS SO STIPULATED.

DATED: December 19, 2024

**LAW OFFICES OF DALE K. GALIPO**

By: /s/Cooper Alison-Mayne  
Dale K. Galipo  
Cooper Alison-Mayne  
*Attorneys for Plaintiffs*

**PORTER SCOTT PC**

DATED: December 19, 2024

/s/ John R. Whitefleet

John R. Whitefleet  
Attorney for Defendant